

ESTTA Tracking number: **ESTTA759933**

Filing date: **07/22/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91226617
Party	Plaintiff Niagara LaSalle Corporation
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Submission	Stipulated/Consent Motion to Extend
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Signature	/Jennifer Kwon/
Date	07/22/2016
Attachments	C15672727 - STRESSBAR Opposition - Consented Motion for 30 Day Extension of Deadlines.pdf(110092 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

-----X	:	
NIAGARA LASALLE CORPORATION,	:	
	:	
Opposer/Counterclaim Defendant,	:	Opposition No. 91226617
	:	Application No. 86/189,035
v.	:	
	:	
STRESSBAR SYSTEMS INTERNATIONAL	:	
LIMITED LIABILITY COMPANY,	:	
	:	
Applicant/Counterclaim Plaintiff.	:	
-----X	:	

**MOTION ON CONSENT FOR EXTENSION OF DEADLINES FOR  
ANSWER TO COUNTERCLAIM, DISCOVERY AND TRIAL**

The deadline for Opposer/Counterclaim Defendant Niagara Lasalle Corporation to Answer the Counterclaim is currently set for July 31, 2016. Opposer/Counterclaim Defendant respectfully requests, with Applicant/Counterclaim Plaintiff Stressbar Systems International Limited Liability Company's consent, that such date be extended by thirty (30) days, or until August 30, 2016, and that all subsequent dates be reset accordingly as follows:

Answer to Counterclaim Due:	08/30/2016
Deadline for Discovery Conference:	09/29/2016
Discovery Opens:	09/29/2016
Initial Disclosures Due:	10/29/2016
Expert Disclosures Due:	02/26/2017
Discovery Period to Close:	03/28/2017
Plaintiff Pretrial Disclosures:	05/12/2017
Plaintiff's 30-day Trial Period Ends:	06/26/2017

Defendant/Counterclaim Plaintiff's Pretrial Disclosures:	07/11/2017
30-day Trial Period for Defendant and Plaintiff in the Counterclaim:	08/25/2017
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due:	09/09/2017
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends:	10/24/2017
Counterclaim Plaintiff's Rebuttal Disclosures Due:	11/08/2017
15-day Rebuttal Period for Counterclaim Plaintiff Ends:	12/08/2017
Plaintiff's Trial Brief Due:	02/06/2018
Defendant's Trial Brief and Plaintiff in the Counterclaim Due:	03/08/2018
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due:	04/07/2018
Reply Brief, if any, for Plaintiff in the Counterclaim Due:	04/22/2018

Opposer/Counterclaim Defendant notes that the prior-filed Motions for Extension of Time with Consent inadvertently referred to extension of "Defendant's Time to Answer" instead of the deadline for "Answer to Counterclaim." This inadvertent error did not impact the deadline dates.

The additional time is requested because the parties are engaged in settlement negotiations.

Applicant/Counterclaim Plaintiff's attorney, Joel G. MacMull, Esq., has consented to this request.

Respectfully submitted,  
LADAS & PARRY LLP

*Attorneys for Opposer/Counterclaim Defendant  
Niagara LaSalle Corporation*

Dated: July 5, 2016

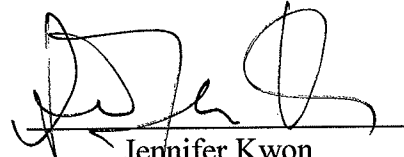
By: 

Dennis Prahl  
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(Our Ref: C15672727)

**CERTIFICATE OF TRANSMISSION**

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing **MOTION ON CONSENT FOR EXTENSION OF DEADLINES FOR ANSWER TO COUNTERCLAIM, DISCOVERY AND TRIAL** is being electronically transmitted to the United States Patent and Trademark Office on the date indicated:

Dated: July 22, 2016

  
Jennifer Kwon

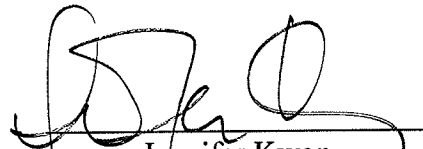
**CERTIFICATE OF SERVICE**

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing **MOTION ON CONSENT FOR EXTENSION OF DEADLINES FOR ANSWER TO COUNTERCLAIM, DISCOVERY AND TRIAL** was served on the person(s) listed below by First-Class Mail, postage prepaid, on the date indicated:

Joel G. MacMull  
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E-mail: [jmacmull@archerlaw.com](mailto:jmacmull@archerlaw.com), [ksozio@archerlaw.com](mailto:ksozio@archerlaw.com)

Dated: July 22, 2016

  
Jennifer Kwon